

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington
February 17, 2021

WILLIAM M. McCOOL, Clerk

By Seamus Kratner Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

VLADIMIR Y. KOZUB, aka LAPA,

Defendant.

CASE NO. CR21-033 JCC

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Possession with Intent to Distribute – Methamphetamine and Heroin)

On or about December 29, 2020, in King County, within the Western District of Washington and elsewhere, VLADIMIR Y. KOZUB, did knowingly and intentionally possess with the intent to distribute, and aid and abet the possession of with intent to distribute, methamphetamine and heroin, both substances controlled under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense involved 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

INDICTMENT

United States v. Vladimir Y. Kozub - 1

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

COUNT 2

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about December 29, 2020, in King County, within the Western District of Washington, VLADIMIR Y. KOZUB knowingly and intentionally possessed a firearm, to wit, *a .45 caliber Colt pistol*, in furtherance of a drug trafficking offense for which he may be prosecuted in a Court of the United States, to wit, *Possession with Intent to Distribute – Methamphetamine and Heroin*, as charged in Count 1, of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 3

(Felon in Possession of a Firearm)

On or about December 29, 2020, in King County, within the Western District of Washington, VLADIMIR Y. KOZUB, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit:

Felon in Possession of a Firearm, 15 CR 5543 BHS, in the U.S.

District Court for the Western District of Washington, on or about

August 22, 2016,

did knowingly possess, and did aid and abet the possession of, a firearm, to wit, *a .45 caliber Colt pistol*, which had previously traveled in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

FORFEITURE ALLEGATIONS

The allegations contained in Counts 1 through 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, the defendant VLADIMIR Y. KOZUB shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

1 Upon conviction of the offenses alleged in Counts 2 and 3, the defendant
2 VLADIMIR Y. KOZUB shall forfeit to the United States, pursuant to Title 18, United
3 States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c),
4 any firearms and associated ammunition that were involved in the offense, including but
5 not limited to, *a .45 caliber Colt pistol*, seized from a vehicle driven by defendant
6 VLADIMIR Y. KOZUB on December 29, 2020.

7 **Substitute Assets.** If any of the property described above, as a result of any act or
8 omission of the defendant:

- 9 a. cannot be located upon the exercise of due diligence;
- 10 b. has been transferred or sold to, or deposited with, a third party;
- 11 c. has been placed beyond the jurisdiction of the court;
- 12 d. has been substantially diminished in value; or,
- 13 e. has been commingled with other property which cannot be divided
14 without difficulty,

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 it is the intent of the United States, pursuant to Title 21, United States Code, Section
2 853(p), to seek the forfeiture of any other property of the defendants up to the value of
3 the above-described forfeitable property.

4
5 A TRUE BILL:

6 DATED: 2/17/2021

7
8 *(Signature of Foreperson redacted*
9 *pursuant to the policy of the Judicial*
10 *Conference of the United States)*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
FOREPERSON

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
BRIAN T. MORAN
United States Attorney

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
TODD GREENBERG
Assistant United States Attorney

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
AMY JAQUETTE
Assistant United States Attorney